

Plaintiff GoldenTree Asset Management LP (“Plaintiff”) and Defendants Schmolz + Bickenbach Luxembourg S.A., Schmolz + Bickenbach AG, and BNP Paribas (“Defendants”) jointly move this Court to extend the briefing schedule related to Plaintiff’s forthcoming Opposition to Defendants’ Motions to Dismiss by 14 days. The Parties jointly request that this Court amend that briefing schedule as follows: (1) Plaintiff to file their Opposition to Defendants’ Motions to Dismiss on or before Tuesday, May 28, 2013; and (2) Defendants to Reply, if necessary, on or before June 27, 2013. The Parties further request that this Court’s prior Order regarding extended page limits for briefing on the Motions to Dismiss be applied to this extended briefing schedule. In support of this Joint Motion, the Parties state as follows:

1. On December 14, 2012, Plaintiff filed the Complaint in this action in the Circuit Court of Cook County, Illinois as case number 12-L-014066.

2. On January 18, 2013, Defendants removed the Complaint to this Court (Dkt. No. 1.)

3. On January 23, 2013, Defendants filed their unopposed motion for extension of time to answer or otherwise respond to the Complaint. (Dkt. No. 8).

4. On January 24, 2013, the Court granted Defendants' motion and set a briefing schedule on any motion to dismiss filed in response to the Complaint. (Dkt. No. 10.) Pursuant to that briefing schedule, Defendants' answer, motion to dismiss, or other responsive pleading were due on March 7, 2013, Plaintiff's response to any such motion was due on or before April 22, 2013, and Defendants' reply in support of any such motion was due on or before May 22, 2013. (Dkt. No. 10).

5. On February 26, 2013, this Court entered an Order granting Defendants leave to file up to 35 pages in support of their respective Motions to Dismiss. The Court also granted Plaintiffs up to 35 pages to respond, and also granted Defendants up to 20 pages to reply. (Dkt. No. 26).

6. On March 4, 2013, Plaintiffs and Defendants filed a joint motion to extend the briefing schedule. (Dkt. No. 27).

7. On March 6, 2013, this Court entered an Order granting Plaintiff and Defendants an extension of the briefing schedule on Defendants' Motions to Dismiss. Pursuant to that briefing schedule, Defendants' Motions to Dismiss were due on or before March 28, 2013, Plaintiff's response was due on or before May 13, 2013, and Defendants' reply in support of any such motion was due on or before June 12, 2013. (Dkt. No. 29).

8. Counsel for Plaintiff and counsel for the Defendants agree to the requested briefing schedule extension as set forth herein.

**WHEREFORE**, all Parties jointly move this Court to extend the briefing schedule related to Plaintiff's forthcoming opposition to Defendants' Motions to Dismiss by 14 days, as set forth herein.

Dated: May 9, 2013

Respectfully submitted,

s/ Michael Hanin\*

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing **Joint Motion to Extend Briefing Schedule** to be filed *via* CM/ECF on May 9, 2013, which will send notification of the filing to all counsel of record in this matter.

/s Michael Hanin\_\_\_\_\_